

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC. , *et al.*,

Debtor.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Related D.I. Nos. 1923 & 2028

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING
STIPULATION RESOLVING LIMITED OBJECTION OF BEACON
PLAZA, LLC TO ASSUMPTION AND ASSIGNMENT OF LEASE
AND FIFTH POST-CLOSING DESIGNATION NOTICE**

The undersigned counsel for Beacon Plaza, LLC (“Beacon”) certifies as follows:

1. On February 20, 2025, Beacon filed its *Limited Objection of Beacon Plaza, LLC to Assumption and Assignment of Lease and Fifth Post-Closing Designation Notice* [D.I. 2028] (the “Objection”) to the *Notice of Filing of Fifth Post-Closing Designation Notice* [D.I. 1923].

2. Counsel for Beacon, the above-captioned Debtors (“Debtors”), Variety Stores, LLC (“Variety”), and Gordon Brothers Retail Partners, LLC (“GBRP” and with Beacon, Big Lots and Variety each a “Party” and together the “Parties”) have engaged in negotiations to consensually resolve the Objection, and have reached an agreement set forth in the *Stipulation Resolving Limited Objection of Beacon Plaza, LLC to Assumption and Assignment of Lease and Fifth Post-Closing Designation Notice* (the “Stipulation”).

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

3. The Parties have prepared a proposed order (the “Proposed Order”), a true and correct copy of which is attached to this Certification as Exhibit A, approving the Stipulation, attached to the Proposed Order as Exhibit 1.

WHEREFORE, it is hereby respectfully requested that the Court enter the Proposed Order at the earliest convenience of the Court.

Dated: March 31, 2025

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